

Michael R. Johnson, Esq. (#7070)
Jonathan A. Dibble, Esq. (#0881)
RAY QUINNEY & NEBEKER P.C.
36 South State Street, 14th Floor
P.O. Box 45385
Salt Lake City, Utah 84145-0385
Telephone: (801) 532-1500
Facsimile: (801) 532-7543
E-mail: mjohnson@rqn.com
E-mail: jdibble@rqn.com

Attorneys for Jacobsen National Group, Inc.

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT UTAH, CENTRAL DIVISION**

In re:

EASY STREET HOLDING, LLC, et al.,

Debtors.

Address: 201 Heber Avenue
Park City, UT 84060

Tax ID Numbers:

35-2183713 (Easy Street Holdings, LLC),
20-4502979 (Easy Street Partners, LLC), and
84-1685864 (Easy Street Mezzanine, LLC)

Bankruptcy No. 09-29905 RKM

(Jointly Administered with Cases 09-
29907 and 09-29908)

Chapter 11

Honorable R. Kimball Mosier

**NOTICE OF RULE 30(b)(6) DEPOSITION OF WEST LB, AG REGARDING JOINT
MOTION TO APPROVE AMENDMENTS TO STIPULATION AUTHORIZING USE OF
CASH COLLATERAL**

PLEASE TAKE NOTICE that, pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, made applicable in this contested matter pursuant to Rules 9014 and 7030 of the Federal Rules of Bankruptcy Procedure, Jacobsen National Group, Inc., dba Jacobsen Construction (“**Jacobsen**”), by and through its counsel of record, will take the deposition upon oral examination of West LB, AG (“**West LB**”), a creditor and party in interest in the above-entitled jointly administered Chapter 11 case, on **Monday, January 11, 2010, at 10:00 a.m. MST**, at the law offices of Ray Quinney & Nebeker P.C., 36 South State Street, Suite 1400, Salt Lake City, Utah 84111. The deposition will be taken orally before a duly authorized court reporter authorized to administer oaths, will be recorded by stenographic means, and will continue from day to day until completed.

Pursuant to and for the purposes permitted by Rule 30(b)(6) of the Federal Rules of Civil Procedure, Jacobsen will examine West LB on the following subjects and topics, and hereby advises West LB of its obligation to designate one or more officers, directors, managing agents, or other persons to testify on its behalf with respect to each subject:

1. Subject 1: All matters related to Wells Fargo Escrow Account, Sky Lodge Sales Proceeds Account, Account No. 7375, and/or Wells Fargo Escrow Account, Sky Lodge Deposit Account, Account No. 7367, and any and all replacement accounts owned, used or maintained by Easy Street Partners, LLC (“**Easy Street**”), or under Easy Street’s control (collectively, the “**Escrow Accounts**”), including but not limited to the nature and purpose of the Escrow Accounts, the nature and source of all funds deposited into the Escrow Accounts, and all actual and contemplated disbursements from the Escrow Accounts.

2. Subject 2: All efforts by Easy Street, after January 1, 2009, to use or obtain authorization or permission to use funds on deposit in the Escrow Accounts to pay Jacobsen for amounts owed for work performed by Jacobsen for and on behalf of Easy Street.

3. Subject 3: All communications between Easy Street and West LB, and/or their agents and representatives, regarding using funds on deposit in the Escrow Accounts to make payments to Jacobsen.

4. Subject 4: Any and all agreements or understandings between Easy Street and West LB regarding using funds on deposit in the Escrow Accounts to make payments to Jacobsen.

5. Subject 5: The nature, extent and priority of any lien or security interest claimed by West LB with respect to the Escrow Accounts and funds on deposit therein, and all documents or agreements establishing or documenting the same.

6. Subject 6: Any and all benefits conferred upon West LB from Jacobsen's performance of construction and construction management services with respect to the Sky Lodge project.

7. Subject 7: Any and all matters relating to that certain *Joint Motion to Approve Amendments to Stipulation Authorizing Use of Cash Collateral Pursuant to 11 U.S.C. § 363 and Granting Additional Adequate Protection to West LB, AG*, filed in the above-entitled Chapter 11 case on November 25, 2009, Doc. 172.

DATED this 22nd day of December, 2009.

RAY QUINNEY & NEBEKER, P.C.

/s/ Michael R. Johnson

Michael R. Johnson
Jonathan A. Dibble
Attorneys for Jacobsen National Group, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on the 22nd day of December, 2009, a true and correct copy of the foregoing was served on the following parties by both first class U.S. mail and e-mail, addressed as follows:

Kenneth L. Cannon II
Steven J. McCardell
DURHAM JONES & PINEGAR
111 East Broadway, Suite 900
PO Box 4050
Salt Lake City, UT 84110-4050
Email: kcannon@djplaw.com
smccardell@djplaw.com

Michael V. Blumenthal
CROWELL & MORING LLP
590 Madison Avenue, 20th Floor
New York, NY 10022
Email: mblumenthal@crowell.com

Annette W. Jarvis
Peggy Hunt
Benjamin J. Kotter
DORSEY & WHITNEY LLP
136 South Main Street
Suite 1000
Salt Lake City, UT 84101-1655
Email: jarvis.annette@dorsey.com
hunt.peggy@dorsey.com
kotter.benjamin@dorsey.com

Richard W. Havel
SIDLEY AUSTIN LLP
555 West Fifth Street, Suite 4000
Los Angeles, CA 90013-1010
Email: rhavel@sidley.com

John T. Morgan
OFFICE OF THE UNITED STATES TRUSTEE
Ken Garff Bldg.
405 South Main Street, Suite 300
Salt Lake City, UT 84111
Email: john.t.morgan@usdoj.gov

Jeffrey W. Shields
Lon Jenkins
JONES WALDO HOLBROOK & McDONOUGH, PC
170 South Main Street, Suite 1500
Salt Lake City, UT 84101
Email: jshields@joneswaldo.com
lajenkins@joneswaldo.com

/s/ Aya Gale
